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**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
**1947 Galileo Court, Suite 103; Davis, CA 95618**  
**(530) 757-3650**

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**TITLE V PERMIT RENEWAL**  
**STATEMENT OF BASIS**

PERMIT NUMBER: F-00536-3  
ENGINEER: René Toledo  
DATE: April 8, 2010

**Facility Name:** MM Yolo Power LLC  
**Mailing Address:** 5087 Junction Road  
Lockport, NY 14094  
  
**Location:** 44090 County Road 28H  
Woodland, CA 95776  
  
**Responsible Official:** Anthony Falbo  
**Title:** Vice President & General Manager  
  
**Application Contact:** Suparna Chakladar  
**Title:** Technical Director of Environmental Services  
**Phone:** (916) 789-2250 ext. 104

**I. FACILITY DESCRIPTION**

MM Yolo Power LLC (MM Yolo) operates an electrical power production facility at the Yolo County Central Landfill. The source is permitted to operate a total of five (5) landfill gas fired internal combustion (IC) engines at the site. Each of the permitted IC engines produces electricity by driving a dedicated electric generator, and each engine is capable of operating independently of one another. Landfill gas is supplied to the site's equipment by the landfill's active gas collection system currently operating under Permit to Operate (PTO) P-26-98(t1) (issued to NEO Yolo LLC). The produced electricity is transferred off-site for sale on the utility grid.

## II. PROPOSED REVISIONS

The source has submitted an approved Yolo-Solano Air Quality Management District (District) application requesting the renewal of Title V operating permit F-00536-0 (issued May 28, 2002). For reference, revisions to Title V permit F-00536-0 have been proposed by significant permit modifications F-00536-1 (proposed May 25, 2005) and F-00536-2 (proposed June 18, 2007). To date neither permit modification has been implemented since the source has not installed the landfill gas fired IC engine proposed by Authority to Construct (ATC) C-04-151 or C-07-37. Both ATCs proposed the replacement of Engine No. 3 (currently permitted under PTO P-80-98). Although the IC engine of P-80-98 has been removed (as verified by District staff), the permit is still valid and will be used in this renewal.

## III. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided that the exemption status of a unit has not changed as defined in current District or Federal rules. The equipment listed in Table 1 is a complete listing of the equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to District Rule 3.2 (Exemptions).

**Table 1** - Exempted and Insignificant Emissions Units

Exempt Equipment Description	Basis for Exemption
Janitorial Services (Non-solvent) Cleaning Supplies	District Rule 2.31, Section 117 (SIP Approved Version 04/27/1994)
Transport Vehicles	District Rule 3.2, Section 101
Air Conditioning System	District Rule 3.2, Section 103
IC Engine Repair and Maintenance	District Rule 3.2, Section 108
Compressed Oxygen Gas Tank	District Rule 3.2, Section 109.1
Compressed Acetylene Gas Tank	District Rule 3.2, Section 109.1
800 Gallon New Oil Storage Tank	District Rule 3.2, Section 109.2
800 Gallon Used Oil Storage Tank	District Rule 3.2, Section 109.2
IC Engine Cooling Tower	District Rule 3.2, Section 112
Steam Cleaner	District Rule 3.2, Section 113
Miscellaneous Welding Equipment	District Rule 3.2, Section 113

#### **IV. SIGNIFICANT EMISSIONS UNIT INFORMATION**

Each of the following emission units has been constructed pursuant to the requirements of an approved ATC that has been issued in accordance with District Rule 3.1 (General Permit Requirements) and District Rule 3.4 (New Source Review).

**Identification Number: P-78-98(a2)**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399, Serial No. 49C01390; Engine No. 1A

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number: P-79-98(a1)**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399, Serial No. 49C728; Engine No. 2

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number: P-80-98**

Equipment Description: 805 BHP landfill gas fired Caterpillar IC engine, Model No. G-399; Engine No. 3

Control Equipment: Low pressure fuel delivery system, and turbocharger with electronic controls

**Identification Number: P-81-98(a1)**

Equipment Description: 1306 BHP landfill gas fired Caterpillar IC engine, Model No. G-3516 SITA, Serial No. 4EK01652; Engine No. 4A

Control Equipment: Automatic air/fuel ratio controller, aftercooler, and turbocharger

**Identification Number:** P-87-98(a1)

**Equipment Description:** 1306 BHP landfill gas fired Caterpillar IC engine, Model No. G-3516 SITA, Serial No. 4EK01693; Engine No. 5A

**Control Equipment:** Automatic air/fuel ratio controller, aftercooler, and turbocharger

## V. TITLE V APPLICABILITY

The total potential to emit (PTE) for all of the MM Yolo equipment permitted at this location exceeds the nitrogen oxide (NO<sub>x</sub>) major source threshold of 25 tons per year. Therefore, the facility is subject to the requirements of District Rule 3.8 (Federal Operating Permits). The facility's emission totals are listed below in Table 2 on a per pollutant basis.

**Table 2 - Total Potential to Emit for Criteria Pollutants**

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	VOC	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>
P-78-98(a2)	4.11	20.19	8.26	3.88	3.65
P-79-98(a1)	4.11	20.19	8.26	3.88	3.65
P-80-98	4.28	20.21	9.33	1.55	0.47
P-81-98(a1)	4.22	37.89	9.28	5.08	3.66
P-87-98(a1)	4.22	37.89	7.67	5.08	3.66
Maximum Facility PTE	20.94	136.37	42.80	19.47	25.09

Also permitted to operate at this site is an active gas collection and control system (including a 54.6 million British Thermal Units per hour (MMBtu/hr) landfill gas fired flare) operated by NEO Yolo LLC (NEO Yolo) under PTO P-26-98(t1). As defined in District Rule 3.4, Section 238, a stationary source is all of the permitted emission units that: (1) belong to the same industrial grouping; (2) are located on one property (or on two contiguous properties); and (3) are under the same or common ownership, operation, or control. Because the MM Yolo engines and the NEO Yolo gas collection system: (1) belong to the same industrial grouping; (2) are located on the same parcel of property; and (3) are under the common operation of MM Yolo Power, the District currently considers

the MM Yolo and the NEO Yolo equipment to be part of the same stationary source. However, the MM Yolo and the NEO Yolo facilities are covered by two separate Title V operating permits. The NEO Yolo gas collection and control equipment is currently permitted by the separate Title V operating permit of F-01348-0 (issued September 26, 2006). Therefore, this permit will continue to reflect only the MM Yolo equipment.

For reference, the landfill's fugitive emissions are currently permitted under the requirements of PTO P-15-05 and issued to the Yolo County Central Landfill. The landfill is currently operating under Title V operating permit F-01392-2 (issued August 20, 2007). Since the Yolo County Central Landfill is not under the same common ownership or control as MM Yolo (or NEO Yolo), it is not considered part of this stationary source.

## **VI. APPLICABLE FEDERAL REQUIREMENTS**

### **A. RULE 2.3 Ringelmann Chart**

#### **Rule Description**

This rule specifies the allowable opacity limit for sources in the District.

#### **Compliance Status**

The rule applies to any visible emissions associated with the operation. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

#### **Permit Condition**

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection (a) of this condition.

**B. RULE 2.5 Nuisance**

**Rule Description**

This rule requires that sources not be a public nuisance.

**Compliance Status**

The rule applies to all emission units at the stationary source. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Permit Condition**

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property.

It should be noted that this permit condition is Federally enforceable because it derives from District Rule 2.5 (Nuisance) that is currently part of the California SIP. The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. Environmental Protection Agency (EPA) has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.

**C. RULE 2.11 Particulate Matter**

**Rule Description**

This rule specifies the allowable particulate matter (PM) emission rate at standard conditions. For the purposes of this evaluation, the PM emissions are considered to be 100% PM<sub>10</sub> (PM with an aerodynamic diameter of 10 microns or less).

**Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule

adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

### **Streamlining Demonstration**

The rule's requirements can be streamlined by District Rule 3.4 operating conditions. The streamlining demonstration is shown below:

**Streamlined Requirement:** The Permit Holder shall not discharge into the atmosphere from any single source of emission, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated at standard conditions.

The District Rule 3.4 requirement for P-78-98(a2) and P-79-98(a1) is 20.0 lb/day PM<sub>10</sub>. The IC engine PM concentrations are calculated below using the engine hourly fuel consumption (9.6 MMBTU/hour) and a landfill gas F-Factor (9,570 DSCF/MMBTU from 40 CFR 60, Appendix A, Table 19-1):

$$= (20.0 \text{ lb PM}_{10}/\text{day}) * (1 \text{ day}/24 \text{ hours}) * (1 \text{ hour}/9.6 \text{ MMBTU}) * (1 \text{ MMBTU}/9,570 \text{ DSCF}) * (7,000 \text{ grains}/1 \text{ lb}) = 0.063 \text{ grains/DSCF}$$

The District Rule 3.4 requirement for P-80-98 is 2.6 lb/day PM<sub>10</sub>. The IC engine's PM concentration is calculated below using its hourly fuel consumption (9.6 MMBTU/hour) and a landfill gas F-Factor (9,570 DSCF/MMBTU from 40 CFR 60, Appendix A, Table 19-1):

$$= (2.6 \text{ lb PM}_{10}/\text{day}) * (1 \text{ day}/24 \text{ hours}) * (1 \text{ hour}/9.6 \text{ MMBTU}) * (1 \text{ MMBTU}/9,570 \text{ DSCF}) * (7,000 \text{ grains}/1 \text{ lb}) = 0.008 \text{ grains/DSCF}$$

The District Rule 3.4 requirement for P-81-98(a1) and P-87-98(a1) is 20.0 lb/day PM<sub>10</sub>. The IC engine PM concentrations are calculated below using the engine maximum horsepower rating (1306 BHP), maximum exhaust flow rate (8,144 ACFM), exhaust temperature (914° F), and exhaust moisture (10.0%) corrected to standard conditions (68° F):

$$= (20.0 \text{ lb PM}_{10}/\text{day}) * (1 \text{ day}/1,440 \text{ min.}) * (7,000 \text{ grains}/1 \text{ lb}) * (1/8,144 \text{ ACFM}) * [(914 + 460) \text{ degrees Rankine} / (68 + 460)^\circ \text{ R}] / (100\% - 10.0\%) = 0.035 \text{ grains/DSCF}$$

The Rule 2.11 requirements are streamlined by the District Rule 3.4 requirements of each of the permits.

**D. RULE 2.12 Specific Contaminants**

**Rule Description**

This rule specifies the allowable sulfur dioxide (SO<sub>2</sub>) and PM emission rates at standard conditions for an emission unit. For the purpose of this evaluation, the sulfur oxide (SO<sub>x</sub>) emissions are considered to be 100% SO<sub>2</sub>.

**Compliance Status**

The rule applies to the stationary IC engines at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Streamlining Demonstration**

The rule's requirements can be streamlined by District Rule 3.4 operating conditions. The requirements for PM have been streamlined by the previous rule. The streamlining demonstration for SO<sub>2</sub> is shown below:

**Streamlined Requirement:** The Permit Holder shall not release or discharge into the atmosphere from any single source: a) sulfur dioxide in excess of 0.2 percent by volume; b) particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

The District Rule 3.4 requirement of P-78-98(a2) and P-79-98(a1) is 21.3 lb/day SO<sub>x</sub>. The engine SO<sub>2</sub> concentrations are calculated below using the engine hourly fuel consumption (9.6 MMBTU/hour) and the landfill gas F-Factor (9,570 DSCF/MMBTU from 40 CFR 60, Appendix A, Table 19-1):

$$\begin{aligned} &= (21.3 \text{ lb SO}_x/\text{day}) * (1 \text{ day}/24 \text{ hours}) * (1 \text{ hour}/9.6 \text{ MMBTU}) * \\ &(1 \text{ MMBTU}/9,570 \text{ DSCF}) * (385 \text{ DSCF SO}_2/\text{lb-mole}) * (\text{lb-mole}/64 \text{ lb SO}_2) \\ &* 100\% = 0.006\% \end{aligned}$$

The District Rule 3.4 requirement of P-80-98 is 8.5 lb/day SO<sub>x</sub>. The IC engine's SO<sub>2</sub> concentration is calculated below using its hourly fuel consumption (9.6 MMBTU/hour) and the landfill gas F-Factor (9,570 DSCF/MMBTU from 40 CFR 60, Appendix A, Table 19-1):



$$= (8.5 \text{ lb SO}_x/\text{day}) * (1 \text{ day}/24 \text{ hours}) * (1 \text{ hour}/9.6 \text{ MMBTU}) * (1 \text{ MMBtu}/9,570 \text{ DSCF}) * (385 \text{ DSCF SO}_2/\text{lb-mole}) * (\text{lb-mole}/64 \text{ lb SO}_2) * 100\% = 0.002\%$$

The District Rule 3.4 requirement of P-81-98(a1) and P-87-98(a1) is 27.8 lb/day SO<sub>x</sub>. The IC engine SO<sub>2</sub> concentrations are calculated below using the engine maximum horsepower rating (1306 BHP), maximum exhaust flow rate (8,144 ACFM), exhaust temperature (914° F), and exhaust moisture (10.0%) corrected to standard conditions (68° F):

$$= (27.8 \text{ lb SO}_x/\text{day}) * (1 \text{ day}/1,440 \text{ min.}) * (385 \text{ SCF}/\text{lb-mole}) * (1 \text{ lb-mole}/64 \text{ lb SO}_2) / (8,144 \text{ ACFM}) * [(914 + 460)^\circ \text{ R} / (68 + 460)^\circ \text{ R}] / (100\% - 10.0\%) * 100\% = 0.004\%$$

The Rule 2.12 requirements are streamlined by the District Rule 3.4 requirements of each of the permits.

#### **E. RULE 2.16 Fuel Burning Heat or Power Generators**

##### **Rule Description**

This rule specifies the allowable nitrogen dioxide (NO<sub>2</sub>), SO<sub>2</sub>, and combustion particulate matter limits for non-mobile, fuel burning, heat or power generating units in the District. For the purpose of this evaluation, the NO<sub>x</sub> emissions are considered to be 100% NO<sub>2</sub>.

##### **Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

##### **Streamlining Demonstration**

As shown below, the rule's SO<sub>2</sub>, NO<sub>2</sub>, and PM emission concentration limits can be streamlined by the permitted District Rule 3.4 operating conditions:

**Streamlined Requirement:** The Permit Holder shall not build, expand, or operate any non-mobile fuel burning equipment for a heat or power

generator unit unless the discharge into the atmosphere of contaminants will not and does not exceed any one or more of the following rates:

- a. 200 pounds per hour of sulfur compounds, calculated as SO<sub>2</sub>;
- b. 140 pounds per hour of NO<sub>x</sub>, calculated as NO<sub>2</sub>; and
- c. 40 pounds per hour of combustion particulate derived from the fuel.

The maximum daily SO<sub>2</sub>, NO<sub>2</sub>, and PM emission concentrations for each of the engines is less than the hourly limits of the rule. Therefore, a specific permit condition is not required for any of the units.

The Rule 2.16 emission requirements for SO<sub>x</sub>, NO<sub>x</sub>, and PM are streamlined by the District Rule 3.4 requirements of each of the permits.

**F. RULE 2.17 Circumvention**

**Rule Description**

This rule prevents sources from concealing emissions to the atmosphere.

**Compliance Status**

The rule is applicable to all of the emission units at the facility. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the requirements of the rule.

**Permit Condition**

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations.

**G. RULE 2.19 Particulate Matter Process Emission Rate**

**Rule Description**

This rule limits the pound per hour PM emission rate of an emission unit based on the hourly amount of material processed.

### **Compliance Status**

The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is exempt from the requirements of the rule pursuant to Rule 2.19, Section A, which requires the use of Rule 1.1 (General Provisions and Definitions), Section 226 to define process weight. District Rule 1.1, Section 226 states, "solid fuels charged will be considered as part of the process weight, but liquid and gaseous fuels and combustion air will not." Since the facility's IC engines can only fire landfill gas as fuel, all of the units are exempt from the requirements of this rule.

### **Permit Condition**

The rule does not apply to the facility, therefore, no permit conditions are required.

## **H. RULE 2.32 Stationary Internal Combustion Engines**

### **Rule Description**

The purpose of this rule is to limit the emission concentrations of carbon monoxide (CO) and NO<sub>x</sub> from stationary IC engines, as well as, require the ongoing emission testing of all affected units.

### **Compliance Status**

The rule applies to all of the stationary IC engines permitted to operate at the facility. The version of the rule used in this evaluation is the rule revised on October 10, 2001, and is part of the California SIP. As verified during emission source testing, each affected four-stroke spark-ignited engine operates with an exhaust oxygen concentration greater than 2%. Each unit meets the definition of "lean-burn engine" as contained in Section 204 of the rule, and for the purpose of this rule will be evaluated as such. The source is currently in compliance with the rule.

### **Streamlining Demonstration**

As shown below, the engines of P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1) are subject to the lean burn engine emission concentration limits of Section 301.4(b) for units rated over 100 BHP. These requirements can be streamlined by District Rule 3.4 operating conditions:

**Streamlined Requirement:** District Rule 2.32, Section 301.4(b) requires the owner or operator of a lean burn stationary IC engine with a rating greater than 100 BHP, limit the emission concentrations from the engine to no more than 150 ppmv of NO<sub>x</sub> and no more than 2,000 ppmv of CO (calculated at 15 percent oxygen (O<sub>2</sub>) on a dry basis).

The District Rule 3.4 requirements of P-78-98(a2) and P-79-98(a1) limit the engines emission concentrations to the following:

- a. VOC (measured as methane): 93.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 261.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 65.0 ppmv @ 15% O<sub>2</sub>.

The District Rule 3.4 requirement of P-80-98 limits the engine emission concentrations to the following:

- a. CO: 2,000 ppmv @ 15% O<sub>2</sub>; and
- b. NO<sub>x</sub> (as NO<sub>2</sub>): 65 ppmv @ 15% O<sub>2</sub>.

The District Rule 3.4 requirements of P-81-98(a1) limits the engine emission concentrations to the following:

- a. VOC (measured as methane): 68.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 349.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 52.0 ppmv @ 15% O<sub>2</sub>.

The District Rule 3.4 requirement of P-87-98(a1) limits the engine emission concentrations to the following:

- a. VOC (measured as methane): 68.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 349.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 43.0 ppmv @ 15% O<sub>2</sub>.

The Rule 2.32, Section 301 requirements are streamlined by the District Rule 3.4 requirements of each permit.

### **Streamlining Demonstration**

District Rule 2.32, Section 302 requires that the operator of an affected IC engine submit to the Air Pollution Control Officer (APCO) an Engine Operator Inspection Plan for each affected unit.

**Streamlining Requirement:** The operator of an engine subject to the provisions of Section 301 of this Rule shall submit to the APCO an Engine Operator Inspection Plan. The plan shall be approved by the APCO in writing. The plan shall be updated after any change in operation. For new engines and modifications to existing engines, the plan shall be submitted to and approved by the APCO prior to issuance of the ATC. The operator may request a change to the plan at any time. The plan shall include the following:

- 302.1        The manufacturer, model number, rated horsepower, and combustion method (i.e., rich-burn, lean-burn, or diesel) of the engine.
- 302.2        A description of the NO<sub>x</sub> control system installed on the engine (if any), including type (e.g., non-selective catalyst, "clean-burn" combustion) and manufacturer, as well as a description of any ancillary equipment related to the control of emissions (e.g., automatic air/fuel ratio controller, fuel valves).
- 302.3        The company identification and location of the engine by a schematic of the affected facilities.
- 302.4        A specific emission inspection procedure to assure that the engine is operated in continual compliance with the provisions of this Rule. The procedure shall include an inspection schedule. Inspections shall be conducted every quarter or after every 2,000 hours of engine operation. In no event shall the frequency of inspection be less than once per year.
- 302.5        Each preventative or corrective maintenance procedure or practice that will be used to maintain the engine and NO<sub>x</sub> control system in continual compliance with the provisions of this Rule.

As part of the processing of PTO's P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1) the source submitted the required engine inspection plan as part of the District's Supplemental Application Form 310 (Internal Combustion Engines). As required by the rule, the supplemental application requires that an owner/operator list all of the applicable identification and performance information for the affected IC engine and it's equipped control device(s). The form also requires that the owner/operator identify the maintenance procedure for the equipment (see file). The completion and submission of District Supplemental Application Form 310 satisfies the requirements of Rule 2.32, Section 302. As such, the permit does not require a specific condition pertaining to the Engine Operator Inspection Plan.

#### **Streamlining Demonstration**

District Rule 2.32, Section 303.1 requires that an affected stationary IC engine be source tested using the methods specified in Section 502 of this Rule at least once in every 24 months. This requirement is streamlined as follows:

**Streamlined Requirement:** Engines subject to the provisions of this Rule shall be source tested using the methods specified in Sections 502.1, 502.2, 502.3 and 502.5 at least once every 24 months.

The District Rule 3.4 source testing frequency condition of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) requires:

The Permit Holder shall perform a source test at least once every 12 months to demonstrate compliance with the VOC, CO, and NO<sub>x</sub> emission limits.

The District Rule 3.4 source testing frequency condition of P-80-98 requires:

The Permit Holder shall conduct annual compliance source tests of the permitted equipment to verify equipment emissions. A source test protocol shall be provided to the District for review at least 14 days prior to the scheduled testing date. Source testing shall utilize District Rule 2.32 methods or other District approved methods. The Permit Holder shall provide the District with a 72-hour notice so that District staff can be present to witness the compliance source test. Testing shall be conducted to verify VOC,

CO, and NO<sub>x</sub> emission rates, as well as, VOC destruction efficiency.

The Rule 2.32, Section 303.1 source testing requirements are streamlined by the District Rule 3.4 requirements of each of the permits.

#### **Streamlining Demonstration**

District Rule 2.32, Section 303.2 requires that during any year which a source test is not performed, a screening analysis be performed for NO<sub>x</sub> and CO. This requirement is streamlined as follows:

**Streamlined Requirement:** During any year which a source test is not performed, a screening analysis using the methods specified in Sections 502.4 and 502.5 of the Rule shall be performed. The screening analysis shall be performed for NO<sub>x</sub> and CO. A reading in excess of the emission standards shall not be considered a violation, so long as the engine is brought into compliance within 15 days of the initial reading, as verified with a subsequent screening analysis.

Since the District Rule 3.4 condition requires that the Permit Holder of P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1) conduct an emission source test of each engine at least once every 12 months (annually) to verify the equipment's NO<sub>x</sub> and CO emission concentrations, a screening analysis of the engines is not required. As such, a specific permit condition is not required for any of the units.

#### **Streamlining Demonstration**

District Rule 2.32, Section 304 requires that the owner or operator of an affected IC engine install and operate a non-resettable totalizing fuel meter on the unit no later than March 7, 2003. This requirement is streamlined as follows:

**Streamlined Requirement:** An owner or operator of an engine subject to this Rule shall install a non-resettable totalizing fuel meter and/or a non-resettable hour meter that measures elapsed operating time, as determined appropriate by the APCO.

The District Rule 3.4 condition on P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) requires:

A non-resettable, totalizing gaseous fuel flow meter shall be installed and utilized to measure the quantity (in cubic feet) of landfill gas combusted in the IC engine. The meter shall be accurate to plus or minus five percent and shall be calibrated at least once every 12 months.

The District Rule 2.32, Section 304 requirements are streamlined by the District Rule 3.4 requirements of the above listed permits.

Since PTO P-80-98 has no fuel meter specific requirement, the following condition will be placed on the Title V permit in order to reflect the requirements of Section 304 of this rule.

#### **Permit Conditions**

An owner or operator of an engine subject to this Rule shall install a non-resettable totalizing fuel meter and/or a non-resettable hour meter that measures elapsed operating time, as determined appropriate by the APCO. [District Rule 2.32, §304.1]

#### **Streamlining Demonstration**

District Rule 2.32, Section 401 requires that an existing IC engine comply with the applicable emission limit requirements of Section 301 by the applicable compliance schedule. The requirements of this section are streamlined as follows:

**Streamlined Requirement:** Owners or operators of existing engines shall comply with the applicable provisions of Section 301.4 of this Rule in accordance with the following schedule:

- a. No later than March 8, 2002, submit to the APCO a complete application for an Authority to Construct, as necessary.
- b. Demonstrate full compliance with all provisions of this Rule, including source testing as required by Section 303.1 and monitoring equipment as required by Section 304, no later than March 7, 2003.

The existing engines of P-78-98(a2), P-79-98(a1), P-80-98, P-81-98(a1), and P-87-98(a1) have demonstrated compliance with the emission limits pursuant to the schedule contained in Section 401.4.



### **Streamlining Demonstration**

District Rule 2.32, Section 402 states that prior to the renewal of operating permit of any affected IC engine, the Permit Holder shall provide the APCO with a report of the actual usage of each affected unit. This requirement is streamlined as follows:

**Streamlined Requirement:** Prior to the renewal of any PTO, each operator subject to the provisions of this Rule shall provide the APCO with a report specifying the actual annual usage (e.g., fuel consumption, actual operating hours) of each affected engine. The report shall also include the engine manufacturer, model number, permit number, and location of each affected engine, a summary of the maintenance and inspection events required in Section 302 of this Rule, and results from the annual emissions testing event.

The District Rule 3.4 conditions of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) streamline the section requirement as follows:

The Permit Holder shall monitor and record the cumulative quarterly and annual landfill gas fuel usage (in cubic feet) from the totalizing meter. The records shall be updated quarterly and made available to the District upon request.

The District must be notified prior to any emissions testing event and a protocol must be submitted for approval 30 days prior to testing. The results of an emissions testing event shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer.

The District Rule 3.4 conditions of P-80-98 streamlines the requirement as follows:

The Permit Holder shall submit to the District annually a report specifying the actual annual operating hours. The report shall identify each engine by permit number. The report shall include a summary of maintenance and testing activities.

Source test results shall be submitted to the District within 30 days of the test date.

The District Rule 2.32, Section 402 requirements are streamlined by the District Rule 3.4 requirements of each permit.

#### **Permit Condition**

The Permit Holder shall maintain an inspection log for each engine, which contains, at a minimum, the following data:

- a. Identification and location of each engine;
- b. Date and results of each emission inspection;
- c. The reading of the totalizing fuel meter for each engine;
- d. A summary of any corrective emissions maintenance actions taken to ensure compliance with the emissions limits; and
- e. Any additional information required in the Engine Operator Inspection Plan. [District Rule 2.32, §501]

#### **Streamlining Demonstration**

Along with the recordkeeping requirements of Section 501 (listed above), the section also contains a two (2) year record retention for each affected IC engine. The rule's retention requirement is streamlined as follows:

**Streamlined Requirement:** The operator shall maintain the inspection log for a period of two (2) years after the date of each entry. The log shall be available for inspection by the APCO upon request.

Per Section 302.6(b) of District Rule 3.8 (Federal Operating Permits), sources subject to Title V permitting shall retain all of the required records for a minimum of five (5) calendar years. As previously discussed for Section 402 of this rule (see above), each permit contains a District Rule 3.4 condition that further streamlines the recordkeeping requirement by instructing the source to update the records quarterly and make them available to the District upon request.

Therefore, the recordkeeping requirements of District Rule 2.32, Section 501 have been streamlined by the requirements of District Rule 3.4 and 3.8 of the permits.

### **Streamlining Demonstration**

District Rule 2.32, Sections 502.1, 502.2, 502.3, and 502.5 require that emission concentration be determined using specific EPA or California Air Resources Board (CARB) reference methods.

**Streamlined Requirement:** Section 502.1 requires that oxides of nitrogen emissions for compliance source tests be determined in accordance with EPA Method 7E or CARB Method 100.

**Streamlined Requirement:** Section 502.2 requires that carbon monoxide emissions for compliance source tests be determined in accordance with EPA Method 10 or CARB Method 100.

**Streamlined Requirement:** Section 502.3 requires that oxygen content for compliance source tests be determined in accordance with EPA Method 3A or CARB Method 100.

**Streamlined Requirement:** Section 502.5 requires that oxides of nitrogen emission limitations specified in Sections 301.1, 301.2 and 301.4 of the rule be expressed as nitrogen dioxide. All ppmv emission limitations are referenced at 15 percent volume stack gas oxygen measured on a dry basis. Source test data point intervals shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes.

The District Rule 3.4 condition of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1) requires the following:

Source testing shall be conducted using the following test methods:

- a. VOC - EPA Method 18;
- b. CO - EPA Method 10 or CARB Method 100;
- c. NO<sub>x</sub> (as NO<sub>2</sub>) - EPA Method 7E or CARB Method 100; and
- d. Stack gas oxygen - EPA Method 3A or CARB Method 100.

The District Rule 3.4 conditions of P-80-98 streamlines the requirement as follows:

The Permit Holder shall conduct annual compliance source tests of the permitted equipment to verify equipment emissions. A source test protocol shall be provided to the District for review at least 14 days prior to the scheduled testing date. Source testing shall utilize

District Rule 2.32 methods or other District approved methods. The Permit Holder shall provide the District with a 72-hour notice so that District staff can be present to witness the compliance source test. Testing shall be conducted to verify VOC, CO, and NO<sub>x</sub> emission rates, as well as, VOC destruction efficiency.

The District Rule 2.32, Section 502 requirements are streamlined by the District Rule 3.4 requirements of the permits.

**I. RULE 3.1    General Permit Requirements**

**Rule Description**

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

**Compliance Status**

The source is currently in compliance with the rule. The version of the rule used in this evaluation is the rule adopted on February 23, 1994, and is part of the California SIP.

**Permit Conditions**

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the APCO as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the APCO. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the APCO or the Hearing Board. [District Rule 3.1, §302.2]

The Permit Holder shall install and maintain such facilities as are necessary for sampling and testing purposes. The number, size, and location of sampling ports shall be in accordance with Air Resources Board Test Method 1. The location and access to the sampling platform shall be in accordance with the General Industry Safety Orders of the State of California. [District Rule 3.1, §303.2 and District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

The PTOs shall not be transferable, by operation of law or otherwise, from one location to another or from one piece of equipment to another. It shall be the transferee's responsibility to inform the District on assumption of ownership or operating control of any item under a permit from the District and for which a PTO will be required. For any such transfer as herein above described, said transferee shall submit an application for authorization in accordance with applicable District Rules. [District Rule 3.1, §304]

Commencing work or operation under the PTOs shall be deemed acceptance of all of the conditions so specified. [District Rule 3.1, §402]

The Permit Holder shall submit an annual throughput/production report at the end of each calendar year for each emissions unit. This report is due no later than March 31 for the previous year. This report must include actual operating hours and actual amounts of materials processed (for materials that have process limits listed on the PTOs). Each type of material and each type of process must be listed separately. [District Rule 3.1, §405.1]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

The Permit Holder shall firmly affix each PTO, an approved facsimile, or other approved identification bearing the permit number upon the facility, article, machine, equipment, or other contrivance in such a manner as to be clearly visible and accessible. In the event that the facility, article, machine, equipment, or other contrivance is so constructed or operated that the permit to operate cannot be so placed, the permit to operate shall be mounted so as to be clearly visible in an accessible place within 25 feet of the facility, article, machine, equipment, or other contrivance, or maintained readily available at all times on the operating premises. [District Rule 3.1, §408]

**J. RULE 3.4 New Source Review**

**Rule Description**

This rule applies to all new stationary sources and emissions units, and all modifications to existing stationary sources and emissions units which are subject to District Rule 3.1 (General Permit Requirements) and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices.

The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

**Compliance Status**

The rule is applicable to all of the emission units at the facility. The source is currently in compliance with the rule. The version of the rule used in this evaluation is the rule adopted on August 13, 1997, and is part of the California SIP. These New Source Review requirements are contained in the most recent ATCs issued to the source and implemented into PTOs.

### Permit Conditions

#### **Permitted Emission Limits:**

The emission limits of each permitted stationary IC engine at the site is summarized below in Table 3.

**Table 3 - Permitted Emission Limits for Each Stationary IC Engine**

Permit	Pollutant	Daily [lb]	Qtr #1 (Jan 1- Mar 31) [lb]	Qtr #2 (Apr 1- June 30) [lb]	Qtr #3 (July 1- Sept 30) [lb]	Qtr #4 (Oct 1- Dec 31) [lb]	Yearly [tons]
P-78-98(a2) (C-07-35) Engine 1A	VOC	22.5	2,028	2,050	2,073	2,073	4.11
	CO	110.7	9,959	10,070	10,180	10,180	20.19
	NO <sub>x</sub>	45.3	4,075	4,120	4,165	4,165	8.26
	SO <sub>x</sub>	21.3	1,915	1,936	1,958	1,958	3.88
	PM <sub>10</sub>	20.0	1,800	1,820	1,840	1,840	3.65
P-79-98(a1) (C-07-36) Engine 2	VOC	22.5	2,028	2,050	2,073	2,073	4.11
	CO	110.7	9,959	10,070	10,180	10,180	20.19
	NO <sub>x</sub>	45.3	4,075	4,120	4,165	4,165	8.26
	SO <sub>x</sub>	21.3	1,915	1,936	1,958	1,958	3.88
	PM <sub>10</sub>	20.0	1,800	1,820	1,840	1,840	3.65
P-80-98 (C-98-122) Engine 3	VOC	23.4	2,108	2,132	2,155	2,155	4.28
	CO	110.7	9,967	10,077	10,188	10,188	20.21
	NO <sub>x</sub>	51.1	4,600	4,651	4,702	4,702	9.33
	SO <sub>x</sub>	8.5	767	775	784	784	1.55
	PM <sub>10</sub>	2.6	230	233	235	235	0.47
P-81-98(a1) (C-07-38) Engine 4A	VOC	23.1	2,081	2,104	2,127	2,127	4.22
	CO	207.6	18,687	18,895	19,103	19,103	37.89
	NO <sub>x</sub>	50.8	4,574	4,625	4,676	4,676	9.28
	SO <sub>x</sub>	27.8	2,505	2,533	2,561	2,561	5.08
	PM <sub>10</sub>	20.0	1,804	1,824	1,844	1,844	3.66
P-87-98(a1) (C-07-39) Engine 5A	VOC	23.1	2,081	2,104	2,127	2,127	4.22
	CO	207.6	18,687	18,895	19,103	19,103	37.89
	NO <sub>x</sub>	42.0	3,783	3,825	3,867	3,867	7.67
	SO <sub>x</sub>	27.8	2,505	2,533	2,561	2,561	5.08
	PM <sub>10</sub>	20.0	1,804	1,824	1,844	1,844	3.66

[District Rule 3.4/C-07-35, C-07-36, C-98-122, C-07-38, and C-07-39]

#### **Applicable Operating Requirements:**

##### **Process limits for the engines of P-78-98(a2) and P-79-98(a1)**

The maximum landfill gas consumption rate for any single engine shall not exceed 512,000 standard cubic feet/day, 46.080 million standard cubic feet/1<sup>st</sup> calendar quarter, 46.592 million standard cubic feet/2<sup>nd</sup>

calendar quarter, 47.104 million standard cubic feet/3<sup>rd</sup> calendar quarter, 47.104 million standard cubic feet/4<sup>th</sup> calendar quarter, and 186.880 million standard cubic feet/year. [District Rule 3.4/C-07-35 and C-07-36]

**Process limits for the engines of P-80-98**

The maximum landfill gas consumption rate for the engine shall not exceed 230 million BTU/day, 20,736 million BTU/1<sup>st</sup> calendar quarter, 20,966 million BTU feet/2<sup>nd</sup> calendar quarter, 21,197 million BTU/3<sup>rd</sup> calendar quarter, 21,197 million BTU/4<sup>th</sup> calendar quarter, and 84,096 million BTU/year. [District Rule 3.4/C-98-122]

Landfill gas usage for all five engines shall be limited to the following:

- a. 1,094 million BTU/day;
- b. 98,496 million BTU/1<sup>st</sup> calendar quarter;
- c. 99,590 million BTU/2<sup>nd</sup> calendar quarter;
- d. 100,684 million BTU/3<sup>rd</sup> calendar quarter;
- e. 100,684 million BTU/4<sup>th</sup> calendar quarter; and
- f. 399,456 million BTU/year. [District Rule 3.4/C-98-122]

**Process limits for the engines of P-81-98(a1), and P-87-98(a1)**

The maximum landfill gas consumption rate for any single engine shall not exceed 669,856 standard cubic feet/day, 60.287 million standard cubic feet/1<sup>st</sup> calendar quarter, 60.957 million standard cubic feet/2<sup>nd</sup> calendar quarter, 61.627 million standard cubic feet/3<sup>rd</sup> calendar quarter, 61.627 million standard cubic feet/4<sup>th</sup> calendar quarter, and 244.497 million standard cubic feet/year. [District Rule 3.4/C-07-38, and C-07-39]

**Conditions specific to the engines of P-78-98(a2) and P-79-98(a1)**

The emission concentrations for the engine shall not exceed the following:

- a. VOC (measured as methane): 93.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 261.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 65.0 ppmv @ 15% O<sub>2</sub>. [District Rule 3.4/C-07-35 and C-07-36]

**Conditions specific to the engines of P-80-98**

The Permit Holder shall record gas consumption for all five engines on a daily, quarterly and yearly basis. Annually updated records shall also be kept of the higher heating value (BTU content) of fuel. Records shall be



kept for five years and available to the District upon request. [District Rule 3.4/C-98-122]

Only landfill gas shall be burned in the engine(s). [District Rule 3.4/C-98-122]

The Permit Holder shall conduct annual compliance source tests of the permitted equipment to verify equipment emissions. A source test protocol shall be provided to the District for review at least 14 days prior to the scheduled testing date. Source testing shall utilize District Rule 2.32 methods or other District approved methods. The Permit Holder shall provide the District with a 72-hour notice so that District staff can be present to witness the compliance source test. Testing shall be conducted to verify VOC, CO, and NO<sub>x</sub> emission rates, as well as, VOC destruction efficiency. [District Rule 3.4/C-98-122]

Source test results shall be submitted to the District within 30 days of the test date. [District Rule 3.4/C-98-122]

**Conditions specific to the engine of P-81-98(a1)**

The emission concentrations for the engine shall not exceed the following:

- a. VOC (measured as methane): 68.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 349.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 52.0 ppmv @ 15% O<sub>2</sub>. [District Rule 3.4/C-07-38]

**Conditions specific to the engine of P-87-98(a1)**

The emission concentrations for the engine shall not exceed the following:

- a. VOC (measured as methane): 68.0 ppmv @ 15% O<sub>2</sub>;
- b. CO: 349.0 ppmv @ 15% O<sub>2</sub>; and
- c. NO<sub>x</sub> (as NO<sub>2</sub>): 43.0 ppmv @ 15% O<sub>2</sub>. [District Rule 3.4/C-07-39]

**Conditions for the IC engines of P-81-98(a1) and P-87-98(a1)**

The Permit Holder shall operate the IC engines in accordance with the approved Parametric Emission Monitoring Plan. [District Rule 3.4/C-07-38, and C-07-39]

**Conditions for the IC engines of P-78-98(a2), P-79-98(a1), P-81-98(a1), and P-87-98(a1)**

The hydrogen sulfide ( $\text{H}_2\text{S}$ ) content of the landfill gas shall not exceed 250.0 ppmv. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

The Permit Holder shall on a yearly basis analyze the fuel's higher heating value (wet basis) and sulfur content (as  $\text{H}_2\text{S}$ ) at least once every 12 consecutive month period. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

The Permit Holder shall perform a source test at least once every 12 months to demonstrate compliance with the VOC, CO, and  $\text{NO}_x$  emission limits. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

Source testing shall be conducted using the following test methods:

- a. VOC - EPA Method 18;
  - b. CO - EPA Method 10 or CARB Method 100;
  - c.  $\text{NO}_x$  (as  $\text{NO}_2$ ) - EPA Method 7E or CARB Method 100; and
  - d. Stack gas oxygen - EPA Method 3A or CARB Method 100.
- [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

The District must be notified prior to any emissions testing (not including the quarterly emission monitoring) event and a protocol must be submitted for approval 30 days prior to testing. The results of an emissions testing event shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.4]

A non-resettable, totalizing gaseous fuel flow meter shall be installed and utilized to measure the quantity (in cubic feet) of landfill gas combusted in the IC engine. The meter shall be accurate to plus or minus five percent and shall be calibrated at least once every 12 months. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

The Permit Holder shall monitor and record the cumulative quarterly and annual landfill gas fuel usage (in cubic feet) from the totalizing meter. The records shall be updated quarterly and made available to the District upon request. [District Rule 3.4/C-07-35, C-07-36, C-07-38, and C-07-39]

Modifications to any PTO, as defined by District Rules and Regulations, requires prior District approval. A modification is defined as any physical change, change in method of operation, addition to or any change in hours of operation, or change in production rate, which: would necessitate a change in permit conditions; or is not specifically limited by a permit condition; or results in an increase in emissions not subject to an emissions limitation. [District Rule 3.4, §223]

**K. RULE 3.8 Federal Operating Permits**

**Rule Description**

This Rule implements the requirements of Title V of the Federal Clean Air Act (CAA) as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

**Compliance Status**

The source has submitted a timely and complete Title V renewal application. As explained in the discussion for District Rule 3.4, this renewal will only reflect the operating requirements contained in the most recent ATCs that have been implemented into PTOs.

If in the future MM Yolo chooses to implement ATC C-07-37 into PTO P-80-98(a), the facility's Title V permit will be administratively amended to reflect the ATC's conditions (as proposed in F-00536-2) using the provisions of Section 203 and Section 404.1 of the rule.

**Permit Conditions**

**Right of Entry:**

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and

- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

**Compliance with Permit Conditions:**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11(a)]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11(b)]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11(c)]

The Permit Holder shall not use the “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11(d)]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11(e)]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11(f)]

**Emergency Provisions:**

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency;

- e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and
- f. In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12(b)]

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12(c)]

**Severability:**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

**Compliance Certification:**

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [District Rule 3.8, §302.14(a)]

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14(b)]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14(c)]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal CAA. [District Rule 3.8, §302.14(d)]

**Permit Life:**

The Title V permit shall expire five (5) years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

**Payment of Fees:**

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

**Application Requirements:**

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and

- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

**Permit Reopening for Cause:**

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is three (3) years or greater, no later than 18 months after the promulgation of such requirement (where less than three (3) years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

**Monitoring, Testing and Analysis:**

Additional monitoring, testing and analysis is covered under the section heading 40 CFR Part 60, Subpart C.

**Recordkeeping:**

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6(a)]

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)]

**Reporting Requirements:**

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[District Rule 3.8, §302.7(a)]

A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of Rule 3.8. [District Rule 3.8, §302.7(b)]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7(c)]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7(e)]

**L. 40 CFR Part 60 Subpart C Emission Guidelines and Compliance Times**

**Rule Description**

This subpart applies to existing municipal solid waste (MSW) landfills and contains emission guidelines and compliance times for the control of NMOCs at these area source categories.

**Compliance Status**

The requirements of the subpart do not apply to any of the stationary IC engines since they are not owned or operated by the Yolo County Central Landfill.

**Permit Condition**

No permit conditions are required.



**M. 40 CFR 63, Subpart ZZZZ Reciprocating IC Engines Maximum Achievable Control Technology**

**Rule Description**

This subpart applies to all engines that: (1) have maximum horsepower ratings at or above 500 BHP; and (2) operate at a major source of hazardous air pollutants (HAPs).

**Compliance Status**

Because the stationary source does not emit more than 10 tons of a single HAP or 25 tons of any combination of HAPs, the stationary source is not considered a major source of HAPs. As such, none of the engines are subject to the requirements of the regulation.

**Permit Condition**

No permit conditions are required.

**N. 40 CFR Part 64 Compliance Assurance Monitoring**

**Rule Description**

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a facility monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an ongoing basis.

The CAM requirements apply to any pollutant specific emissions unit at a major source that is required to obtain a Part 70 permit and which satisfies all the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

**Compliance Status**

The source is exempt from the requirements of this federal subpart, since the source does not operate any control device (e.g. selective catalytic reduction (SCR), oxidation catalysts, etc.) to achieve compliance with any emission limit or standard.

**Permit Condition**

The permit does not require a CAM specific condition.